

Exhibit 56

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Declaration of Dr. Sabrina Salmon

1. My name is Dr. Sabrina Salmon, and I make this declaration based on my personal knowledge.

2. I received a Bachelor of Science in Special Education in August of 1998 from Winthrop University, a Master's of Art in Marriage and Family Therapy from Pacific Lutheran University in August of 2000, and a Doctor of Philosophy in Education from Capella University in December of 2012

3. I have over 15 years experience working in K-12 education.

4. I have been the Senior Director of Exceptional Education at Tucson Unified School District ("TUSD") since July 2020 and have worked within TUSD since July 2016. Before being the Senior Director of Exceptional Education, I was an Assistant Director of Exceptional Education and a Principal at TUSD.

5. In my position as Senior Director of Exceptional Education, I provide mentorship and coaching to 5 Assistant Directors and 20 additional members of the Ex Ed Leadership Team, organize communication, emotional intelligence, and conflict resolution professional development to build leadership capacity among staff members. I also serve on the Special Education State Panel to advise ADE on best practices and challenges for urban public schools. I collaborate with ADE and Pima County Superintendent's office to establish a framework that will reduce the workload on public schools in response to expanded school choice opportunities to strengthen the partnership with private, parochial, and homeschool students and families. I interact with internal and external partners to remain focused on our vision, mission, and initiatives.

6. I support a group of 30 bachelor, master, and clinical level school based social workers, over 35 school psychologists, and a behavior team that includes up to 11 individuals who

provide emotional support by working with youth and teens to assist with self-regulation and maintaining access to the educational environment. Staff meet with individual students and focus on social growth and development as outlined in their Individualized Education Plan (IEP), 504 Plan, or Behavior Intervention Plan (BIP). This team explains the pros and cons of social media. They help students navigate social interactions in person and virtually by being aware of safety protocols.

7. Currently, addressing the effects of social media use on TUSD is the biggest challenge we address as a district. Nearly every student who we support with social and behavioral goals has experienced negative school and community situations that lead them to receive specialized assistance and intervention when dealing with an issue related to social media. Accordingly, a substantial amount of my work time, and the work time of my colleagues and the social workers, school psychologists, exceptional education teachers, and paraprofessionals that we oversee and work with, is spent addressing the fallout of social media's negative impact on students.

8. In my experience, I have seen a growing problem of addictive, compulsive and problematic social media use among our students. We face a constant battle in separating students from their phones as students are unable to regulate or control their use of social media. Both parents and students report sleep deprivation amongst students in our school district due to excessive social media use and many students report suffering from physical effects, such as eye strain and headaches, caused by prolonged screen exposure.

9. I have also observed an alarming rise in student anxiety and depression which I believe is tied to social media. For example, during the last 8 years I have noticed an increase in students preferring to engage in electronic platforms, including a growing number of students who

experience substantial emotional or physical reactions to technology being limited or eliminated from their access during the school day. In the last 4 years, I have witnessed several students become physically aggressive with peers and adults when using “first then” charts that establish a restriction on using electronic devices or having access to social media. An increasing number of students select the use of electronics and access to social media as a preferred activity or as an incentive that is connected to a formal behavior plan.

10. Ultimately, there are numerous negative effects from students’ personal use of social media that I and other directors, program coordinators, and behavioral support staff in our school district must address. These effects include, but are not limited to, excessive use of social media which impacts student’s mental health and emotional wellbeing, negative impacts on performance in school, students use of fake social media accounts which expose children to dangerous situations on social media, and/or bullying and harassment that occurs on social media platforms and spills over into the school environment.

11. Importantly, I have observed that the impacts of social media on students’ wellbeing are unique to social media use. For instance, I have observed that many students experience negative mental health impacts directly tied to their use of social media, such as an increase in anxiety, struggling to establish and maintain social connections with peers and adults, more suicidal ideation and attempts, self-injurious behavior, difficulty falling and remaining asleep, poor school attendance, and more requests from adolescents and teens to attend virtual or homebased instruction as opposed to participating in middle and high school brick and mortar settings. I have not observed similar effects from students’ use of cell phones generally, e.g., texting.

12. Similarly, bullying and harassment that occurs on social media platforms exacerbate the issues I and the assistant directors, program coordinators, social workers, school psychologists, behavior specialists, and instructional specialists I oversee and work with must address, as the bullying and harassment are disseminated further and for longer periods of time than they would be absent a social media platform and social media emboldens students to engage in this type of behavior that does not occur when interacting in person.

13. I am aware of students creating and participating in social media pages that encourage fighting, physical aggression, and anti-social behaviors that have significant physical and emotional impacts on young people.

14. Students have created electronic group chats, texts, and other communication methods to participate in dare related behaviors at school and in the community. This behavior greatly impacts the district, including damage to district property and increased discipline.

15. These numerous negative effects from students' personal use of social media cause many issues that I must address as Senior Director of Exceptional Education and that the assistant directors, program coordinators, social workers, school psychologists, behavior specialists, and instructional specialists oversee and work with must address. For example, we are receiving more requests to provide support for students who disrupt the educational environment, scholars who engage in behaviors to escape from the classroom or the school campus, more difficulty focusing on and completing academic tasks, an increase in requests for counseling as a related service, and the need for more specialized behavior support such as hiring Registered Behavior Technicians. I collaborate with the Student Relations Department and School Safety to address bullying, school threats, or other behavior that is addressed in our districts code of conduct.

16. The time that I and the assistant directors, program coordinators, social workers, school psychologists, behavior specialists, and instructional specialists I oversee and work with must spend on social media related impacts on students has substantially increased in the time that I have worked at TUSD.

17. The Exceptional Education team of over 300 teachers, approximately 350 paraprofessionals, over 70 social workers and school psychologists that I oversee spend 3 hours a day providing direct support to students and consultation to adults to respond to and to plan for student emotional regulation needs.

18. Based on my experience as Senior Director of Exceptional Education, and in my previous role as an Exceptional Education Assistant Director, going back to the 2016-17 school year, I believe that approximately 60% of time spent by all Masters-level Social Workers, 80% of Licensed Clinical Social Workers, 75% of Bachelors-level Social Workers, and 50% of other Social Workers was spent on social media related concerns and addressing the impacts of students' personal social media use. Going back to the 2016-17 school year, I believe that about 50% of time spent by School Psychologists, School Counseling Interns, Psychology Interns, Psychology Externs, and other Psychologists was spent on social media related concerns and addressing the impacts of students' personal social media use. Going back to 2016, I believe that approximately 80% of time spent by Exceptional Education Intervention Specialists and 60% of time spent by Exceptional Education Behavior Intervention Specialist was spent on social media related concerns and addressing the impacts of students' personal social media use. Furthermore, I believe that each of these percentages has been at least this much and likely increased each year since 2016-17.

19. Because of the percentage of time that the assistant directors and I, program coordinators, social workers, school psychologists, behavior specialists, and instructional specialists oversee and work with spend on addressing social media impacts on students, this means we have less time to dedicate to other aspects of our jobs. For example, we minimize our time establishing systems that promote academic development and growth. We spend less time conducting classroom observations, providing staff feedback, and analyzing the progress and future needs of both our students and our staff. The majority of our day is dedicated to intervention of behavior and social media related matters. Our team would prefer to increase inclusive practices, provide families with resources related to disability awareness, access to housing or other resources, and preparing students for both in school and community transitions. We often miss student celebrations including art performances, student recognition activities, or engagement in personal growth and development because of time devoted to social media created or exacerbated matters. Parents, community members, and staff become frustrated with the class disruptions and loss of learning.

20. Moreover, while having additional staff would be helpful in addressing the negative impacts that the rising use of social media by students has had on students and the district, TUSD has not been able to increase hiring commensurate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on May 13, 2025.

Dr. Sabrina Salmon